

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VIKRAM P. GROVER, d/b/a)	
“IX ADVISORS” a/k/a “IXA”)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No 1:21-cv-5054
)	
NET SAVINGS LINK, INC.,)	Judge Mary M. Rowland
WILTON GROUP, LIMITED,)	
WILTON UK (GROUP) LIMITED,)	
CHINA FOOD AND BEVERAGE CO.,)	
JAMES TILTON, and)	
JOHN DOES 1-100)	
)	
<i>Defendants.</i>)	

**DEFENDANTS NET SAVINGS LINK, INC. AND JAMES TILTON’S RESPONSE TO
PLAINTIFF VIKRAM P. GROVER’S EMERGENCY MOTION FOR TEMPORARY,
PRELIMINARY AND/OR PERMANENT, EQUITABLE AND INJUNCTIVE RELIEF,
AND SPECIFIC PERFORMANCE AGAINST DEFENDANT JAMES TILTON**

NOW COMES Defendants, NET SAVINGS LINK, INC. (“NSAV”) and JAMES TILTON (“Tilton”) (collectively referred to herein as “Defendants”), by and through their attorneys, COLE SADKIN, LLC, and in response to Plaintiff VIKRAM P. GROVER’s (“Grover” or “Plaintiff”) Emergency Motion for Temporary, Preliminary and/or Permanent, Equitable and Injunctive Relief and Specific Performance against Defendant James Tilton states as follows:

INTRODUCTION

1. Plaintiff filed his emergency motion for injunctive relief on August 26, 2024. On September 27, 2024, the court appointed a temporary receiver for Defendant NSAV. On

September 30, 2024, the court entered a minute entry stating that they would consider NSAV's Motion to Vacate and Defendants NSAV and Tilton's Motion to Reconsider at a future date after receiving the temporary receiver's first report which is due by October 28, 2024.

2. Defendant NSAV's Motion to Vacate was filed on August 15, 2024, and has subsequently been waiting for a briefing schedule or ruling to be entered regarding the Motion. At the time of the entry of the default judgment, Defendant NSAV was not represented by counsel, and has not had an opportunity to robustly defend itself from charges by Plaintiff. On August 16, 2024, this honorable court entered a minute entry stating that a briefing schedule for the Motion to Vacate would be set by the court at a later date.

ARGUMENT

3. Defendants filed a Motion to Reconsider on September 27, 2024. The courts has not scheduled a briefing schedule or issued a rule considering the motion. The court entered a minute entry stating that the Motion to Reconsider would not be briefed until after the temporary receiver submits his initial report which is not due until October 28, 2024.

4. Until the Motion to Reconsider has been ruled on it is inappropriate to allow garnishment or encumber Defendants' ability to operate the business. Impeding NSAV's ability to perform as a business impedes the ability of NSAV to satisfy any judgment after the Motion to Reconsider has been ruled on.

5. On September 27, 2024 A temporary receiver has already been appointed by the court to manage the Defendant NSAV despite the pending Motion to Vacate and Motion to Reconsider.

6. Defendant NSAV's filed a Motion to Vacate on August 15, 2024 which has not been briefed or ruled on. The court entered a minute entry on August 16, 2024 stating that a

briefing schedule would be set at a later date, but has not entered one as of the date of this filing. In the instance that the Motion to Vacate is granted, Defendant NSAV would be permitted to fully defend and litigate the allegations against them, which may result in a change to the underlying judgment.

7. Until the Motion to Reconsider and Motion to Vacate have been ruled on there is a possibility that the underlying judgment will be modified so this motion is premature.

WHEREFORE, Defendants NET SAVINGS LINK, INC. and JAMES TILTON respectfully request that this court deny Plaintiff's Emergency Motion for Temporary, Preliminary and/or Permanent, Equitable and Injunctive Relief and Specific Performance against Defendant James Tilton and enter a briefing schedule for the Defendants' NSAV and TILTON's Motion to Reconsider and NSAV's Motion to Vacate.

Dated October 4, 2024

Respectfully submitted,

By: /s/ Mason S. Cole
One of Defendant's Attorneys

COLE SADKIN LLC
Mason S. Cole, ARDC No. 6307727
1652 W. Belmont Ave., Ste. 1
Chicago, Illinois 60657
T: (312) 548-8610
mcole@colesadkin.com
Counsel for Plaintiff